

IN THE UNITED STATES BANKRUPTCY
COURT FOR THE SOUTHERN DISTRICT OF
TEXAS HOUSTON DIVISION

In re:	§	
	§	Case No. 20-33948 (MI)
Fieldwood Energy III LLC, <i>et al.</i> ,	§	
	§	Chapter 11
Post-Effective Date Debtors ¹ .	§§	Jointly Administered

STIPULATION AND AGREED ORDER EXTENDING RESPONSE DATE
AND RESETTING HEARING DATE ON PLAN ADMINISTRATOR'S
OBJECTION TO RED WILLOW OFFSHORE, LLC'S
PROOF OF CLAIM
[this relates to Dkt. No. 2833]

This stipulation and agreement (the "Stipulation") is entered into by and among (i) David Dunn, the plan administrator (the "Plan Administrator") appointed pursuant to the Notice of (I) Entry of Order Confirming Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors [Docket No. 2016]²; and Red Willow Offshore, LLC ("RWO") regarding the Plan Administrator's Objection to the Proof of Claim of Red Willow Offshore, LLC [Docket No. 2833] (the "Objection"). The Parties hereby stipulate and agree as follows:

WHEREAS, on or about November 25, 2020, RWO timely filed Proof of Claim Number 617 (the "RWO Claim").

WHEREAS, the Plan Administrator filed his Objection to the RWO Claim on August 15,

¹ The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor's federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III, LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the "Post-Effective Date Subsidiaries") are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtor), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

² Capitalized terms used but otherwise not defined herein shall have the meanings ascribed to such terms in the Plan.

2023, which included a response date of September 14, 2023 and an initial pre-trial hearing on October 2, 2023 @10:30 am CT.

WHEREAS, the Parties have agreed to enter into and jointly submit this Stipulation extending RWO's response date and resetting the date of the initial pre-trial hearing in connection with the Objection.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

1. RWO's deadline to respond to the Objection is extended to and through October 18, 2023, subject to further extensions based on the Parties' agreement.
2. The initial pre-trial hearing on the Objection is reset to November 6, 2023 at 10:00 a.m., or such later time as the Court directs.

IN WITNESS WHEREOF, this Stipulation has been executed and delivered as of the day and year first written below.

IT IS SO ORDERED

Dated: _____

UNITED STATES BANKRUPTCY JUDGE
MARVIN ISGUR

IN WITNESS WHEREOF, this Stipulation has been executed and delivered as of the day and year first below written.

Dated: September 12, 2023

**BOND ELLIS EPPICH SCHAFER JONES
LLP**

By: /s/ Aaron Guerrero

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**ATTORNEYS FOR DAVID DUNN, PLAN
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